

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Stream TV Networks, Inc.,¹

Debtor.

Chapter 11

Bky. No. 23-10763 (MDC)

In re:

Technovative Media, Inc.,

Debtor.

Chapter 11

Bky. No. 23-10764 (MDC)

(Jointly Administered)

MOTION FOR ADMISSION *PRO HAC VICE* OF SCOTT D. COUSINS

Rafael X. Zahralddin-Aravena (“Movant”), a member in good standing of the Bar of the Supreme Court of Pennsylvania and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Pennsylvania, and a partner in the law firm of Lewis Brisbois Bisgaard & Smith, LLP, moves for entry of an order permitting Scott D. Cousins (“Applicant”), to appear *pro hac vice* in the above-captioned bankruptcy case and any related adversary proceedings as counsel for debtors, Stream TV Networks, Inc. and Technovative Media, Inc. (the “Debtors”), pursuant to Local Bankruptcy Rule 2090-1(b) of the United States Bankruptcy Court for the Eastern District of Pennsylvania. In support of this Motion, Movant respectfully states as follows:

1. Scott D. Cousins is a partner with the law firm of Lewis Brisbois Bisgaard & Smith, LLP, located at 500 Delaware Avenue, Suite 700, Wilmington, DE 19801.

¹ The Debtors, together with the last four digits of the Debtors' federal tax identification numbers, are Stream TV Networks, Inc. (...4092) and Technovative Media, Inc. (...5015). The location of the Debtors' service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

2. Applicant is a member in good standing with the Bar of the State of Delaware and is also admitted to practice before the United States District Court for the District of Delaware.

3. Applicant is a member in good standing in the jurisdiction for which he is admitted and/or a member, and is not currently under suspension or subject to other disciplinary action.

4. Attached as **Exhibit A** is Applicant's certification that he is eligible for *pro hac vice* admission under Local Bankruptcy Rule 2090-1(b).

5. Pursuant to Local Bankruptcy Rule 9014-2, and because this Motion does not present contested issues, Movant requests that this Court consider this Motion *ex parte* and without an oral hearing.

6. The filing fee has been paid upon the filing of this Motion with the Court.

WHEREFORE, Movant respectfully requests entry of an Order submitted simultaneously herewith approving the admission *pro hac vice* of Scott D. Cousins as counsel to Debtors, Stream TV Networks, Inc. and Technovative Media, Inc., in connection with the above-captioned bankruptcy case and any related proceedings, and for such other and further relief as is necessary and appropriate.

Date: January 2, 2024

Respectfully submitted,

/s/ Rafael X. Zahralddin-Aravena

Rafael X. Zahralddin-Aravena (PA Bar No. 71510)
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